



Telephone Cable TV Internet

February 29, 2008

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: EB Docket No. 06-36

Dear Ms. Dortch;

Enclosed on behalf of PrairieWave Telecommunications, Inc. (Form 499 Filer ID 807851) please find the Customer Proprietary Network Information (CPNI) certification and statement of procedures.

Should you require additional information, please do not hesitate to contact me. I can be reached at (706) 645-3966 or via email at bruce.schoonover@knology.com

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Schoonover, Jr.", with a long horizontal flourish extending to the right.

Bruce Schoonover, Jr.
Director – Regulatory Affairs
Knology, Inc.

Enclosures

cc: Enforcement Bureau, Telecommunications Consumers Division
Best Copy and Printing, Inc.

Certificate
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 29, 2008

Name of Company covered by this certification: PrairieWave Telecommunications, Inc.

Form 499 Filer ID: 807851

Name of Signatory: Chad Wachter

Title of Signatory: VP, General Counsel and Secretary

I, Chad Wachter, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to insure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. The company has not taken any actions (proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission) against data brokers in 2007. Customer service and sales personnel are trained on the need to maintain the confidentiality of CPNI and to be alert to attempts by unauthorized persons to access CPNI. All company personnel with access to CPNI records know that only properly identified and authenticated customers can have access to his/her CPNI. Any questionable activity with regard to the access to or the use or distribution of CPNI is immediately reported to the legal department and the Compliance Officer for review. The company has not detected any attempts by pretexters or other unauthorized persons to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed  _____

Statement of Company Procedures
EB Docket No. 06-36

The following facts support the certification:

1. The company uses the opt-out procedure to determine whether a customer consents to the use of its CPNI for internal marketing of communications related services to the customer. Every new telephone customer receives a privacy policy and CPNI letter in the Welcome Packet. The letter explains CPNI and provides a space at the bottom of the letter for the customer to complete if s/he wishes to opt-out. The customer is also given a web address where s/he can opt-out at any time. The last two-year notice was mailed in April, 2006 – a new opt-out notice will be mailed in April, 2008. Approximately 400 customers have opted-out of using their CPNI for marketing purposes. When a customer opts-out the customer contact and the outbound sales databases are updated to reflect that fact. If the customer opts-out using the letter, the letter is imaged to the customer service record. Sales and customer care personnel know that the failure to opt-out is not effective until 33 days after the date of the opt-out notification.
2. All customer care and sales personnel are trained by their respective supervisors on the policies and procedures of PrairieWave including those that are applicable to CPNI protection and use. The Employee Code of Conduct and the Employee Information Manual stress the need to maintain the confidentiality of all customer and company information. The Legal Department did annual training in February and March of 2007 on CPNI security and the protection of company and customer information requirements in the Code and Manual. The sales group maintains ongoing training as reflected in the CPNI section of its Sales Training Package. The customer care group is trained frequently online throughout the year on CPNI using information contained on the PrairieWave Intranet site by navigating to the PrairieWave Information Center and to the Customer Service (General) tab. Personnel are trained and monitored on customer authentication using information other than readily available biographical customer information.
3. PrairieWave did not initiate a password authentication for customer access to his/her CPNI in 2007. PrairieWave does not have online customer access to CPNI.
4. PrairieWave did not conduct any sales and marketing campaigns in 2007 using CPNI. PrairieWave did not need or seek any opt-in consents. PrairieWave does not use a joint venture partner or third parties for the purpose of marketing communications related services to customers.
5. PrairieWave did not release any CPNI to third parties for marketing or any other purposes in 2007.

6. The supervisors of PrairieWave's sales and customer care operations monitor data security on a daily basis. No use of CPNI is authorized without approval of these supervisors and the Legal Department/Compliance Officer. Release of CPNI to law enforcement or through other legal process must be reviewed and approved by the Legal Department. All marketing information and materials are reviewed by the Legal Department/Compliance Officer before use or deployment. The unauthorized access to or use or disclosure of CPNI is punishable under the PrairieWave Code of Conduct and Employee Information Manual by disciplinary actions up to and including termination of employment.